

AUG 23 2017

David J. Bradley, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

V.

**LUIS CARLOS DE LEON-PEREZ,
NERVIS GERARDO
VILLALOBOS-CARDENAS,
CESAR DAVID RINCON-GODOY,
ALEJANDRO ISTURIZ-CHIESA,
AND RAFAEL ERNESTO
REITER-MUNOZ,**

DEFENDANTS

CRIMINAL NO.

17 CR 514

UNDER SEAL

GOVERNMENT'S MOTION TO SEAL

The United States, by and through its attorney, the United States Attorney for the Southern District of Texas, hereby moves to seal the indictment in the above captioned case, along with this motion and the attached order. In support of this motion, the government states as follows.

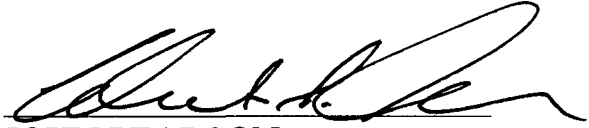
The indictment in this case charges the defendants with conspiracy to violate the foreign corrupt practices act, conspiracy to commit money laundering, and substantive money laundering counts. The defendants face significant prison terms if arrested and successfully prosecuted. The defendants are not located in the United States and are significant flight risks. The government must seek their arrest by international arrest warrant. The investigation is ongoing. Disclosure of the

indictment prior to arrest of the defendants may result in the destruction of evidence or flight of the defendants. The Government therefore requests that the Court seal the indictment, this motion and the Court's order. The Government requests that the Court order the District Clerk's Office to release copies of the indictment to the United States Attorney's Office, the Internal Revenue Service—Criminal Investigations, and the Department of Homeland Security, upon request.

WHEREFORE, it is respectfully requested that this motion be granted.

Respectfully submitted,

ABE MARTINEZ
Acting United States Attorney
Southern District of Texas

By: 
JOHN PEARSON
ROBERT JOHNSON
Assistant United States Attorneys